



Draft Environmental Assessment

WCCO Transmitter Site

Coon Rapids, Minnesota

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FEMA

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Federal Emergency Management Agency
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1.0 INTRODUCTION

The Federal Emergency Management Agency (FEMA) has identified several radio transmission sites throughout the United States of America that provide significantly powerful signals which can be used for communication purposes in the event of a national catastrophe. Each site is required by FEMA to have between 30 and 60 days of auxiliary back-up diesel fuel available on the site to power the transmission site in the event of a power outage. This requires that between 6,000 and 12,500 gallons of diesel fuel be located on the site, depending on the requirements of each transmission site. To this end, FEMA has contracted with the Primary Entry Point Administrative Council, Inc. (PEPAC), a 501c Washington, D.C.-based non-profit corporation, to upgrade, maintain, and manage the emergency power systems installed and owned by FEMA located at the transmission sites throughout the US. FEMA will own the emergency fueling system and its associated components, and will subcontract with PEPAC to do the maintenance and oversight at each radio transmission site.

PEPAC is proposing to expand an existing electrical generator room and decommission an existing fuel system with the installation of a new 12,000-gallon diesel underground storage tank (UST) and auxiliary fuel system at the WCCO tower facility located at 3237 Coon Rapids Boulevard, Coon Rapids, Anoka County, Minnesota (Proposed Action). In accordance with the National Environmental Policy Act (NEPA), FEMA is required to evaluate the potential environmental impacts of their facilities and operations. NEPA requires that a federal agency assume the lead role in assuring the NEPA process is completed. For this Draft Environmental Assessment (Draft EA), FEMA will be the lead federal agency because the upgrades to the backup systems will be funded by FEMA. In compliance with NEPA (42 U.S.C. §§ 4321 *et seq.*), this Draft EA examines the potential impacts of the Proposed Action and a No Action Alternative.

1.1 Project Authority

In accordance with the National Environmental Policy Act of 1969, the Council of Environmental Quality (CEQ) regulations implementing NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and FEMA regulations for NEPA compliance (44 CFR Part 10), FEMA must fully understand and consider the environmental consequences of actions proposed for federal funding. The purpose of this Draft EA is to meet FEMA's responsibilities under NEPA and to determine whether to prepare a Finding of No Significant Impact (FONSI) or a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the proposed project.

1.2 Project Location

The project would be located at the existing WCCO Transmitter Site at 3237 Coon Rapids Boulevard, Coon Rapids, MN (latitude 45°10.6399N, longitude 93° 20.997W). The Mississippi River is located generally parallel to Coon Rapids Boulevard, approximately 1,500 feet south-

southwest of the proposed project location. The proposed project location is approximately 18 miles north-northwest of the downtown area of Minneapolis, Minnesota. The approximate site location is presented on a topographic map as Figure 1, and an aerial photograph of the site is provided as Figure 2 included in Appendix A.

1.3 Purpose and Need

The electrical generator and fuel system equipment at the facility is required to provide emergency backup electrical power to the transmitter facility in the event of a loss of electrical power supply to the transmitting equipment. The purpose of the action alternatives presented in this EA is to upgrade the quality and capacity of the emergency power supply equipment at the WCCO Transmitter Site, because FEMA has determined the radio site is a necessary part of the above-mentioned national catastrophe support network. The current emergency backup system does not have double-walled construction and leak detection equipment installed, which increases the potential that impacts to the subsurface soils and groundwater could occur. The upgrading activities are needed to minimize the potential of impact to the human and natural environment from a potential petroleum product release. The Proposed Action is not being considered in response to a known UST leak, or a historic release of hazardous materials from the site systems.

In accordance with federal laws and FEMA regulations, the EA process for a proposed federal action must include an evaluation of alternatives and a discussion of the potential environmental impacts. This EA was prepared in accordance with FEMA's regulations as required under NEPA. As part of this NEPA review, the requirements of other environmental laws and executive orders are addressed.

1.4 Existing Facility

The existing WCCO emergency generator system includes one single-walled carbon steel 10,000-gallon UST located northwest of the transmitter building, and one Katolight 250 KW emergency generator located in the generator building west of the transmitter building. The existing UST provides diesel fuel to supply a day tank located in the generator building. Current fuel piping at the site consists of underground, steel, single-walled piping which connects the UST to the day tank and the UST to the fuel filtration system. The existing day tank is located on the southwest corner of the generator skid. The current fuel filtration system is located in the southwest corner of the generator building. The piping inside the generator building is a combination of steel piping and other tubing material. The fuel system is installed with a pump at the day tank to transfer fuel from the UST to the day tank.

2.0 ALTERNATIVES ANALYSIS

According to NEPA protocol, PEPAC and FEMA are required to provide alternatives to the proposed project. FEMA has selected the WCCO Transmitter Site based on the prime location

and signal strength that this transmitter site provides. Alternative locations within the WCCO Transmitter Site property to install the upgraded equipment were considered but dismissed as non-viable, as the new generator building and new fuel system equipment must be located in the same area of the existing generator building for logistical purposes. The proposed new UST installation location westerly adjacent to the existing UST and generator building within the existing WCCO Transmitter Site property was selected as the preferred alternative based on its proximity to the existing equipment infrastructure. No new land would be required to be added to the WCCO property. However, a No Action Alternative was considered as part of this Draft EA.

2.1 Proposed Action

Under the Proposed Action, PEPAC proposes to replace the existing UST with a new 12,000-gallon, double-walled fiberglass reinforced plastic UST with automatic tank monitoring and leak protection equipment, and replacement of the ancillary fuel system at the WCCO transmitter facility located at 3237 Coon Rapids Boulevard, Coon Rapids, MN (latitude 45°10.6399N, longitude 93° 20.997W). A new electric generator would be installed at the site inside an addition to the existing generator building. The new addition would include secondary containment for the fuel system inside the building for environmental protection. The original generator building was constructed in 1990.

Under the Proposed Action, the new UST would be located north of the existing UST, approximately 14 feet below ground surface (bgs). The new generator building addition would be located west of the current building as shown on Figure 3, and is 18 feet by 16 feet in size. The new location of the UST would be designed to provide access for fuel tank truck delivery and tank filling operations. The new day tank, fuel filtration equipment would be located inside the new generator building addition. The UST tank monitoring and leak detection equipment would be located in the transmitter building. Underground piping connecting the new UST and the generator building would be approximately three feet bgs. The ground disturbance anticipated to be necessary for the installation of the Proposed Action would total approximately 2,540 square feet, which includes the tank basins and associated pipe trenching. Equipment necessary to complete the Proposed Action includes backhoes, compactors, trailers, cranes, and associated support vehicles, which would be staged behind (to the south of) the existing generator building.

The Proposed Action would also require that the existing UST (approximately 13 feet bgs), day tank, fuel filtration system, and piping would be decommissioned, removed and closed in accordance with federal, state, and local requirements.

2.2 No Action Alternative

Under the No Action Alternative, the existing UST and generator equipment would not be upgraded. Risks to human health and safety associated with a potential release of petroleum

products to the environment associated with the existing UST and fuel system because of aging and outdated equipment would not be mitigated.

3.0 AFFECTED ENVIRONMENT AND CONSEQUENCES

3.1 Physical Environment

3.1.1 Geology, Seismicity, and Soils

The location of the proposed site is the northeastern quarter of Section 17, Township 31 North, and Range 24 West. The site is located directly north of Coon Rapids Boulevard in the City of Coon Rapids, Anoka County, MN. The property is approximately 780 feet above sea level in a generally flat area of the state, and is located approximately 1,500 feet north-northeast of the Mississippi River, which runs generally parallel to Coon Rapids Boulevard.

According to the Geologic Map of Minnesota, Simplified Bedrock Geology (Howe, 2000), the WCCO Transmitter Site consists of the Cambrian formation, which includes Quartzose and glauconitic sandstone, and lesser amounts of siltstone and carbonate.

Historically, seismic risk for the project location is reportedly low. The most recent earthquake recorded in Minnesota was 3.1 in magnitude on February 9, 1994 in the central portion of the state. The largest earthquake recorded in Minnesota was in Stevens County, located northwest of the project location which registered a 5.0 in magnitude on July 9, 1975 (Stover et al. 1993). In order to qualify for funding assistance from FEMA, Executive Order (EO) 12699, Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction must be followed. However, existing building codes and state requirements and standards will address and/or mitigate the minor seismic risk.

A review of the "Soil Survey of Anoka County, Minnesota" (SCS 2008) indicates the subject property is comprised of the Hubbard coarse sand soils which are made up of outwash found on stream terraces. The Hubbard coarse sands are excessively drained with a low available water capacity. In these soils, the depth to water table is reportedly more than 6 feet bgs.

Discussion of Alternatives

Proposed Action

Short term impacts to site soils would occur during the construction phase of the project. The Proposed Action requires that the area for the installation of the new UST be excavated to approximately 12 feet bgs. In the event the excavated soil was observed to be contaminated (petroleum odor and/or staining), the soils would undergo waste characterization (sampled for laboratory analysis) before removal to an approved disposal site certified to accept petroleum-contaminated soils. Clean replacement material would be used if necessary to backfill the new

UST. Short term impacts would be mitigated by Best Management Practices (BMPs) which would include the stockpiling and covering the excavated soil on-site to help prevent fugitive dust and/or soil erosion. Upon completion of the construction activities, the disturbed area would be revegetated to prevent soil erosion.

The Farmland Protection Policy Act (FPPA) (P.L. 97-98, Sec. 1539-1549; U.S.C. 4201, et seq.), which stated that federal agencies must "minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to nonagricultural uses," was considered in this EA. The WCCO Transmitter Site property has already been developed, and the Proposed Action would not entail the conversion of farmland in the area.

No Action Alternative

Under the No Action Alternative, the short-term impacts to the site soil during the construction phase of the Proposed Action would be avoided.

3.1.2 Water Resources and Water Quality

During the site visit on March 12, 2009, no surface waters were observed in the proposed project area, or on the parent tract WCCO Transmitter Site. Stormwater runoff on the site is estimated to flow south-southwest towards the Mississippi River, located approximately 1,500 feet from the site.

According to the Coon Rapids 2006 Drinking Water Report, the City of Coon Rapids provides drinking water to its residents from a series of groundwater wells ranging from 105 feet bgs to 705 feet bgs. These municipal supply wells reportedly extract groundwater from the Multiple, Franconia-Mt. Simon, Iron-ton-Mt. Simon, Quaternary Buried Artesian, Franconia-Iron-ton-Galesville, Jordan, and Franconia-Eau Claire aquifers. The sampling activities of the water sources reportedly did not observe contaminants at concentrations that violated federal drinking water standards.

Discussion of Alternatives

Proposed Action

The Proposed Action would provide a net benefit to the site watershed by upgrading fuel storage and piping equipment on the site. The current UST and auxiliary piping equipment has the potential to leak or release petroleum contaminants into the subsurface soils and groundwater. Installing a new UST system with automatic leak detection equipment would reduce the potential for contaminant leakage into the environment. The Proposed Action would not require the use of groundwater to operate or complete.

No Action Alternative

Under the No Action Alternative, potential impacts to the site subsurface soils and groundwater could occur from the leakage or release from the outdated and aging UST and auxiliary piping equipment. The current underground piping system does not have double-walled construction and leak detection equipment installed, which increases the potential that impacts to the subsurface soils and groundwater could occur.

3.1.3 Floodplain Management

This project property is not within the 500-year floodplain as indicated in the Flood Insurance Rate Map (FIRM), panel # H&I-02, Community # 270011A for the City of Coon Rapids, Minnesota, Anoka County. Therefore, a discussion of floodplain mitigation measures needed for the Proposed Action is not warranted. A copy of the floodplain map for the site is included as Figure 4 in Appendix A.

3.1.4 Air Quality

The Clean Air Act requires the U.S. Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment; the Clean Air Act established two types of national air quality standards; primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly; secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation and buildings; current criteria pollutants are: Carbon Monoxide (CO), Nitrogen Dioxide (NO₂), Ozone (O₃), Lead (Pb), Particulate Matter (PM), and Sulfur Dioxide (SO₂).

According to the Minnesota Air Quality Index Summary Report for 2008, the Twin Cities area of Minnesota – of which Coon Rapids is included – had five days out of the year when the air quality index was over 100, indicating that unhealthy levels of air pollutants were present. For 2008, the main pollutant contributing to the compromise of air quality was PM.

Discussion of Alternatives

Proposed Action

The Proposed Action would entail the emission of air pollutants into the atmosphere during the construction activities and when the generator equipment is running. Construction equipment that burns petroleum products would be used to excavate and fill the old UST pit and piping areas. Emissions from fuel-burning internal combustion engines (e.g. heavy equipment and earth moving machinery) could temporarily increase the levels of some pollutants, including CO, Volatile Organic Compounds, NO₂, O₃, and PM; these increases would be temporary. To reduce the emission of criteria pollutants, fuel-burning equipment running times would be kept to a minimum and only used when necessary. The generator equipment would be used as an emergency back-up power source. Based on the size of the generator proposed to be installed at the site (250 kW), an air permit under Title V of the Clean Air Act would not be required.

An additional short term effect from the construction activities required for the Proposed Action entails the potential for the release of fugitive dust from excavated soil. To reduce the potential temporary impacts to air quality from fugitive dust, PEPAC should water down construction areas when necessary during construction.

No Action Alternative

Under the No Action Alternative, air quality at the site would not be affected. The short-term impacts to the air from the construction phase of the Proposed Action would be avoided.

3.2 Biological Environment

3.2.1 Terrestrial and Aquatic Environment

The location of the proposed site is the northeastern quarter of Section 17, Township 31 North, and Range 24 West. The site is located directly north of Coon Rapids Boulevard in the City of Coon Rapids, Anoka County, MN. The parent tract property is currently used as a radio transmitter site, which includes several radio towers and buildings. The site of the Proposed Action is located in an area within the WCCO transmitter property that is previously disturbed land, and is surrounded by developed residential and commercial land. During the site visit on March 12, 2009, the site was snow-covered; however, previous photographs taken of the site in June 2008 indicated that the site is vegetated with native grasses and weeds. No evidence of wetland habitat, streams, ponds or other aquatic environments were identified on the WCCO Transmitter Site during Terracon's previous site visits.

Discussion of Alternatives

Proposed Action

The Proposed Action does not appear to create a significant effect to the existing terrestrial environment. The UST and ancillary piping equipment would be buried on the site, and the extent of ground disturbance would be minimal because of the limited nature of the project. A new addition to the generator building would be constructed to house the new equipment; however, the addition would be located on a previously disturbed portion of the WCCO Transmitter Site property.

No Action Alternative

Under the No Action Alternative, the existing terrestrial environment on the site would not be affected.

3.2.2 Wetlands (Executive Order 11990)

Under the Clean Water Act (40 CFR § 230.3), wetlands are defined as "those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes,

bogs and similar areas." Potential wetlands under the jurisdiction of the United States Army Corps of Engineers (ACOE) include waterways, lakes, streams, and natural springs. Executive Order (EO) 11990, Protection of Wetlands, requires federal agencies to take action to minimize the loss of wetlands. The NEPA compliance process requires federal agencies to consider direct and indirect impacts to wetlands, which may result from federally funded actions.

Terracon reviewed the USFWS National Wetlands Inventory (NWI) map available online at the NWI website. The review of the USFWS NWI map indicated that wetlands are not identified on the site. The closest wetlands are reportedly located approximately 1,000 feet to the northwest of the site. Residential and commercial development is located between the WCCO Transmitter Site and the closest wetlands. A copy of the USFWS NWI map for the site is provided as Figure 5 and included in Appendix A.

As shown on the relevant USGS 7.5-Minute Series Topographic Map, the site is not located adjacent to surface waters. During Terracon's site reconnaissance, there was no evidence of potential wetlands, hydric soils, or hydrophytic vegetation at the site. Furthermore, a review of the relevant soil survey map did not note hydric soils at the site.

Because of the lack of wetlands habitat at or near the WCCO Transmitter Site, further discussion of wetlands mitigation measures needed for the Proposed Action is not warranted.

3.2.3 Threatened and Endangered Species

In accordance with Section 7 of the Endangered Species Act (ESA) of 1973, the project area was evaluated for the potential occurrences of federally and state listed threatened and endangered (T&E) species. The ESA requires any federal agency that funds, authorizes or carries out an action to ensure that their action is not likely to jeopardize the continued existence of any endangered or threatened species (including plant species) or result in the destruction or adverse modification of designated critical habitats.

The location of the proposed site is the northeastern quarter of Section 17, Township 31 North, and Range 24 West. The site is located directly north of Coon Rapids Boulevard in the City of Coon Rapids, Anoka County, MN. The parent tract property is currently used as a radio transmitter site which includes several radio towers and buildings. The site of the Proposed Action is located in an area within the WCCO transmitter property that is previously disturbed land and is surrounded by developed residential and commercial land. During the site visit on March 12, 2009, the site was snow-covered; however, previous photographs taken of the site in June 2008 indicated that the site is vegetated with native grasses and weeds.

Discussion of Alternatives

Proposed Action

Based on a comparison of T&E species habitats with the existing disturbed lot, the Proposed Action does not appear to create an effect to T&E species. Additionally, the extent of ground disturbance would be minimal because of the limited nature of the project, and T&E species or their habitats would not likely be affected. Terracon and FEMA have issued letters to the U.S. Fish and Wildlife Service (USFWS) and the Minnesota Department of Natural Resources – Region 3 (MDNR) to request concurrence with this conclusion. Copies of the correspondence are included in Appendix B, which includes a list of Anoka County, Minnesota's endangered, threatened, and special concern species list.

A response received from the MDNR dated September 21, 2009 stated that habitat for a species of special concern, *Ligumia recta*, Black Sandshell mussel, has been documented within a one mile radius around the Proposed Action location. However, given the details of the Proposed Action that were provided and the documented location of the species (within and on the banks of the Mississippi River), the MDNR does not believe the proposed project will negatively effect any known occurrences of rare features.

A response received from the USFWS dated September 28, 2009 stated that there are no federally listed or proposed species and/or designated or proposed critical habitat within the action area of the proposed project. A qualified Fish and Wildlife Biologist with the USFWS stated that if project plans change, additional information on listed or proposed species becomes available, or new species are listed that may be affected by the project, consultation should be reinitiated.

No Action Alternative

Under the No Action Alternative, the existing terrestrial environment on the site would not be affected; however, because the site lacks critical habitat for endangered and/or threatened species, effects to species would not be mitigated by implementing the No Action Alternative.

3.3 Hazardous Materials

The WCCO Transmitter Site currently has one existing double-walled carbon steel 10,000-gallon UST located northwest of the transmitter building, and one existing 250 KW emergency generator located in the generator building west of the transmitter building. The existing UST provides diesel fuel to supply a day tank located in the generator building. Current fuel piping at the site consists of underground, steel, single-walled piping which connects the UST to the day tank and the UST to the fuel filtration system.

USTs which contain petroleum or hazardous materials are subject to the Minnesota's Pollution Control Agency's (MPCA) design and operating rules for USTs. Tank appurtenances such as piping and dispensers are also covered. New UST rules became effective on March 24, 2008. The MPCA's UST program has been revised to reflect the new rules. The following list

summarizes the MPCA regulations for tank owners and tank contractors during installation of USTs:

- All new USTs, associated piping, fuel dispensers, and submersible pump heads must have a secondary containment design, meaning a liquid-tight barrier to capture and detect leaks.
- Secondary containment designs include double-walled fiberglass, double-walled steel with cathodic protection of the outer wall, double-walled jacketed steel, and single-walled jacketed steel with interstitial monitoring capability. Secondary containment designs for piping include all those listed above, and include double-walled flex piping.
- Drop tubes extending to within 12 inches of the tank floor are required for all tanks. New gasoline tanks must have a drop tube extending to within six inches of the tank floor if the facility has greater than 10,000 gallons monthly throughput.

Additionally, according to the MPCA, during the decommissioning and removal of existing USTs the tanks shall be emptied of all liquid and accumulated sludge and purged of all vapors. Piping shall be emptied of all liquid and sludge, purged and capped, or removed from the ground. The liquids and sludge must be treated as a hazardous waste and disposed of according to state and federal regulations.

Installation of new UST: The applicable law for installation and removal of an underground storage tank in the State of Minnesota is Minnesota Rules, Chapter 7150, Underground Storage Tanks. Prior to any new installations of UST systems or components in the State of Minnesota, owners must provide 10-day pre-notification to the MPCA. A certified contractor must oversee all work, which will be in accordance with applicable codes. The minimum requirements for underground storage tank installation, as identified by the MPCA, must be followed by the contractor overseeing the installation.

Discussion of Alternatives

Proposed Action

The Proposed Action addresses the need to upgrade the out of date and aging petroleum storage equipment at the WCCO Transmitter Site and the replacement UST would comply with the March 2008 MPCA secondary containment and leak detection requirements, including a drop tube present in the UST that extends to a depth of approximately six inches from the bottom of the new UST. A new electric generator would be installed at the site inside a new addition to the existing generator building which would include secondary containment features for environmental protection. These upgrades are needed to minimize the potential of impact to the human and natural environment from petroleum product releases from the out of date and aging UST system.

The Proposed Action is not being considered in response to a known UST leak, or historic releases of hazardous materials from the site systems. However, excavation activities could expose or otherwise affect subsurface soils and groundwater at the site that have been impacted by petroleum wastes or materials. Any hazardous material releases to the site subsurface soils and/or groundwater discovered during implementation of the Proposed Action shall be assessed and remediated by PEPAC in accordance with applicable local, state, and federal regulations. The minimum requirements for underground storage tank installation and removal, as identified by the MPCA, must be followed by the contractor overseeing the installation.

The Proposed Action includes the modification and expansion of the existing generator building. Asbestos-containing materials (ACM) may exist within building materials used in construction prior to 1978. ACM in building materials was banned by the federal government in 1978. The existing building was constructed in 1990; therefore, the building would not need to be assessed for ACM during the building modification activities.

No Action Alternative

The existing UST system does not have complete leak detection and equipment installation safeguards; the generator building does not have secondary containment features, and the underground piping is not double-walled. Under the No Action Alternative, the existing UST system would remain at the site, which would continue to pose a threat to the human and natural environment from the risk of a release or leak of hazardous materials to the subsurface soils and groundwater at the site.

3.4 Socioeconomics

3.4.1 Zoning and Land Use

According to the City of Coon Rapids, Minnesota 2008 Zoning Map included as Figure 6 in Appendix A, the WCCO Transmitter Site is currently zoned Office. The northerly and easterly adjoining properties are reportedly zoned Residential: Low Density 2. The westerly adjoining properties are reportedly zoned Residential: Moderate Density and General Commercial. The southerly adjoining properties are reportedly zoned Office and Residential: Low Density 1. The site is within the incorporated city limits of Coon Rapids, MN.

Discussion of Alternatives

Proposed Action

Because the Proposed Action involves only the upgrading of existing infrastructure in support of the WCCO Transmitter Site's current activities, alteration of the site's zoning status is not anticipated to be necessary. No potential long-term or short-term effects to zoning and land use patterns would be anticipated under the Proposed Action.

No Action Alternative

Under the No Action Alternative, the zoning designation of the site would remain the same.

3.4.2 Visual Resources

The existing UST and underground piping system is not in the view shed of the general human population. The existing generator building can be observed from Coon Rapids Boulevard, and potentially from residences and businesses to the west and north.

Discussion of Alternatives

Proposed Action

The Proposed Action involves the installation of new UST system, and the construction of a new addition to the generator building similar in size and footprint as the existing generator building shown on Figure 3 in Appendix A outlining a general layout of the Proposed Action in comparison to the existing site conditions. The view shed of the surrounding vicinity would not be adversely impacted by the proposed action.

No Action Alternative

Visual resources in the area would not be affected by implementation of the No Action Alternative.

3.4.3 Noise

Noise is defined herein as undesirable sound, is federally regulated by the Noise Control Act of 1972 (NCA); although the NCA gives the EPA authority to prepare guidelines for acceptable ambient noise levels, it only charges those federal agencies that operate noise-producing facilities or equipment to implement noise standards; the EPA's guidelines, and those of many federal agencies, state that outdoor sound level in excess of 55 decibels (dB) are "normally acceptable" for noise-sensitive land uses such as residences, schools and hospitals.

The project area is surrounded to the north, east, and west by residences, which are defined as sensitive receptors to noise. FEMA owns the existing UST system and electrical generator, and to date, has not received complaints from the residential sensitive receptors in the area. The project area is bound to the south by Coon Rapids Boulevard, which is a four-lane street that emits traffic noise to the surrounding community on a continual basis.

Discussion of Alternatives

Proposed Action

During the construction activities of removing the existing UST system and the installation of the building addition and new equipment, the most elevated noise levels would be from the construction equipment. The use of the construction equipment for the new installations would be restricted to normal daytime hours to help mitigate negative noise effects to the residences in the near vicinity. After the new equipment and building addition installation is completed,

noise would be limited to delivery trucks filling the UST with diesel fuel periodically, and the engine noise from the generator equipment at the site. The new generator equipment is expected to operate quieter and more efficiently than the existing electrical generator. The Proposed Action has the potential to provide a net benefit to the area in reference to noise levels.

No Action Alternative

Current noise levels would not change by implementing the No Action Alternative. The short-term impacts to the ambient noise levels from the construction phase of the Proposed Action would be avoided.

3.4.4 Public Services and Utilities

Electrical and natural gas services are provided by Coon Rapids Municipal Utilities. The City of Coon Rapids Utility Division manages the city's drinking water and wastewater utilities. The Coon Rapids Fire Department services the site, and reportedly consists of 31 professional career firefighters, office members, and 20 paid-on-call firefighters who assist with major accidents. The Coon Rapids Police Department is a 24-hour law enforcement agency, handling 43,000 calls for service each year for the city. Health Central Corp Hospital in Coon Rapids is the nearest hospital to the WCCO Transmitter Site, and is located approximately six miles northeast of the site on Coon Rapids Boulevard.

Because the existing UST system and the Proposed Action does not increase or decrease the demand on the City of Coon Rapids' public services or utilities, a discussion about potential effects is not warranted. A representative of the Coon Rapids Fire Department is expected to be present during the removal of the existing UST as standard local protocol requires.

3.4.5 Traffic and Circulation

The WCCO Transmitter Site is surrounded by residential streets and roads to the north, east and west, and Coon Rapids Boulevard to the south. The City of Coon Rapids maintains the residential streets and roads in the vicinity of the site, and Anoka County maintains Coon Rapids Boulevard. The residential streets and roads are reportedly two lanes in width, and Coon Rapids Boulevard is a four-lane road. Two regular bus routes (Route 850 and Route 852) service Coon Rapids Boulevard on weekdays and Saturday. The only entrance to the WCCO Transmitter Site is from Coon Rapids Boulevard. According to the Minnesota Department of Transportation's most recent traffic volume map for Coon Rapids, the daily average traffic count for Coon Rapids Boulevard is approximately 21,500 vehicles per day in the vicinity of the WCCO Transmitter Site.

Discussion of Alternatives

Proposed Action

Traffic on Coon Rapids Boulevard would increase slightly during the construction phase of the Proposed Action. The construction activities would be limited to regular working hours. After

the Proposed Action is completed, traffic patterns and volumes would resume to their levels pre-construction.

No Action Alternative

Under the No Action Alternative, the short-term impacts to the traffic patterns and volumes from the construction phase of the Proposed Action would be avoided.

3.4.6 Environmental Justice (Executive Order 12898)

In February 1994, President Clinton issued Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (59 Fed. Reg. 7629 (1994)). This order directs Federal agencies to incorporate environmental justice as part of their missions. Federal agencies are specifically directed to identify and, as appropriate, to address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority populations and low-income populations.

The U.S. Census Bureau reportedly estimated the population for the City of Coon Rapids to be 62,207 in 2006. The median value of owner occupied homes in 2005-2007 was reportedly \$210,500. The estimated median household income in Coon Rapids in 2005-2007 was reportedly \$60,193 compared to \$67,275 countywide. Anoka County's labor force for 2005-2007 was reportedly 36,169 (US Census Bureau 2009).

In the 2005-2007 American Community Survey conducted by the U.S. Census Bureau for Coon Rapids, 90.1% of individuals reported being White. The largest minority group, Black or African-American, reportedly accounted for 3.7% of the city population. Statewide, 88.0% of the population was reported as White, and 4.3% as Black or African-American. The overall poverty rate for individuals in Coon Rapids was reportedly 5.6%, compared to 9.8% nationally (U.S. Census Bureau 2000).

Census data are compiled at a variety of levels corresponding to geographic areas. In order of decreasing size, the areas used are states, counties, census tracts, block groups, and blocks. A block group is a subdivision of a census tract and is the smallest geographic unit for which the Census Bureau tabulates sample data. A block group consists of all the blocks within a census tract with the same beginning number.

Due to the lack of substantial minority populations in the block group data for the vicinity of the subject property, demographic maps were not prepared and analyzed for this EA. In compliance with FEMA's policy implementing EO 12898, Environmental Justice, the socioeconomic conditions of the project vicinity have been reviewed and do not appear to have a disproportionately high or adverse impact on minority or low-income populations.

3.4.7 Safety and Security

USTs and generators have environmental, safety, and health hazards associated with them. The environmental damage caused by a spill of petroleum products creates a safety concern to

the human and the natural environment. Petroleum is a highly flammable substance. Explosions and fires at UST sites have occurred in the past. There are several hypothetical accident scenarios for the site including: removal of the existing UST, failure of the new UST, failure of the fuel piping, and improper unloading operations for transfer of diesel fuel between the tank truck and the UST.

Failure of a UST is the least likely of the three scenarios to occur and not expected to create an explosion or fire due to its underground installation. A failure of the aboveground piping could occur causing an explosion or fire. The new fuel system installation is designed to provide more protection with installation of weld steel piping. A release or spill of diesel fuel as part of unloading fuel from the tank truck to the UST is possible due to human error. Various safety measures would be installed to help limit the potential of a release or spill as part of unloading operations including equipment, overfill monitoring, a high level audio alarm and acknowledgement button, and signage with various unloading operations requirements and procedures posted at the UST. For the removal and closure of the existing UST, various procedures and operations would be used to limit the potential of an explosion or fire including inerting the tank, monitoring air space for combustible gases, and specific procedures for removing the tank.

The existing UST and fuel piping system are deemed by PEPAC to be out of date and aging equipment. Currently, if any of the three hypothetical accident scenarios posed in the paragraph above were to occur, diesel fuel would be released directly to the environment via the groundwater and/or soil.

Discussion of Alternatives

Proposed Action

The UST system, piping network, and generator equipment proposed by PEPAC to replace the existing system includes environmental safeguards to help minimize potential releases or spills of petroleum products to the environment. These safeguards include double-walled construction, automatic leak detection, and secondary containment for aboveground piping and equipment. The inclusion of these safeguards helps provide a positive effect to the site and would reduce the potential for releases and spills of dangerous substances to the human and natural environment.

To help minimize risks to safety and human health, construction activities would be performed using qualified personnel trained in the proper use of the project equipment including appropriate safety precautions. Additionally, activities would be conducted in a safe manner in accordance with the standards specified in Occupational Safety and Health Act (OSHA) regulations.

No Action Alternative

Under the No Action Alternative, the safety concerns associated with construction activities would be limited. The hazardous material leak detection and prevention features of the Proposed Action would not be installed. The existing UST and piping systems would remain in place, increasing the potential for a release or spill of hazardous materials to the human and natural environment.

3.5 Historic and Cultural Resources

In addition to review under NEPA, consideration of effects to historic and cultural resources is mandated under Section 106 of the National Historic Preservation Act (NHPA), as amended, and implemented by 36 CFR Part 800. Requirements include identification of significant historic and cultural properties that may be affected by the Proposed Action.

As defined in 36 CFR Part 800.16(d), the Area of Potential Effect (APE), "is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist." The APE is defined as the WCCO Transmitter site property.

3.5.1 Historic Structures

As defined by 36 CFR 800.16(1)(1), historic property means any "prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places."

Discussion of Alternatives

Proposed Action

A search of historic properties was conducted by the Minnesota Historical Society on April 23, 2009 for records and surveys of historic and cultural resources within the APE of the Proposed Action. The initial database search identified one historic property, the Aranda Giddings Farmstead, located within the site's section, township, and range. A specific address for the historic property was not available. A letter was sent to Mr. Dennis Gimmestad, Government Programs & Compliance Officer with the Minnesota State Historic Preservation Office (MN SHPO) on April 24, 2009 requesting review of the site plans and its location relative to the Aranda Giddings Farmstead to determine the potential for the Proposed Action to adversely impact the property. A response received May 29, 2009 from Ms. Britta Bloomberg, Deputy State Historic Preservation Officer, stated that no properties listed on or eligible for listing on the National Register of Historic Places would be affected by this project. FEMA sent a second letter to Ms. Bloomberg, stating that Terracon's original letter did not adequately state that the Proposed Action was a federally funded activity. The letter asked for a second review and comments addressed to FEMA. A response received September 2, 2009 from Ms. Bloomberg, stated that no properties listed on or eligible for listing on the National Register of Historic

Places would be affected by this project. Copies of the MN SHPO correspondence are included in Appendix C.

During the ground-disturbing activities of the Proposed Action, the excavation activity would be monitored. If any artifacts or human remains are observed or found during the excavation process, all work would cease and PEPAC will notify FEMA and the SHPO/THPO.

No Action Alternative

Under the No Action Alternative, historic properties in the area would not be affected; however, because the site vicinity lacks historic properties, effects to historic properties would not be mitigated by implementing the No Action Alternative.

3.5.2 Archeological Resources

As defined by 36 CFR 800.16(1)(1), historic property means any "prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places."

Discussion of Alternatives

Proposed Action

A search of historic properties was conducted by the Minnesota Historical Society on April 23, 2009 for records and surveys of archeological resources within the APE of the Proposed Action. The initial database search identified no previously known archeological resources located within the site's section, township, and range. A letter was sent to Mr. Dennis Gimmetad, Government Programs & Compliance Officer with the Minnesota State Historic Preservation Office on April 24, 2009 requesting his concurrence of no effect on archeological resources within the APE of the Proposed Action. A response received May 29, 2009 from Ms. Britta Bloomberg, Deputy State Historic Preservation Officer, stated that no properties listed on or eligible for listing on the National Register of Historic Places would be affected by this project. FEMA sent a second letter to Ms. Bloomberg, stating that Terracon's original letter did not adequately state that the Proposed Action was a federally funded activity. The letter asked for a second review and comments addressed to FEMA. A response received September 2, 2009 from Ms. Bloomberg, stated that no properties listed on or eligible for listing on the National Register of Historic Places would be affected by this project. Copies of the MN SHPO correspondence are included in Appendix C.

During the ground-disturbing activities of the Proposed Action, a portion of the site would be excavated for the removal of the existing UST and the installation of the new UST. Excavation activities could result in the discovery of artifacts or human remains. If any artifacts or human remains are observed or found during the excavation process, all work would cease and PEPAC will notify FEMA and the SHPO/THPO.

No Action Alternative

Under the No Action Alternative, properties of archeological significance in the site vicinity would not be affected; however, because the site vicinity lacks properties of archeological significance, effects to properties would not be mitigated by implementing the No Action Alternative.

3.5.3 Tribal Coordination and Religious Sites

On November 6, 2000, President Clinton signed EO 13175, entitled, "Consultation and Coordination with Indian Tribal Governments". The EO directs federal agencies, "to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes..."

In accordance with the Native American Grave Protection and Repatriation Act, requests for evaluation of the presence or absence of known archeological and Indian Religious sites within the proposed project area were submitted by Terracon and FEMA to the following federally recognized tribal groups in Minnesota that indicated interest in projects within Anoka County, Minnesota:

- Bad River Band of the Lake Superior Tribe of Chippewa Indians, Wisconsin
- Bois Forte Band (Nett Lake) of the Minnesota Chippewa Tribe, Minnesota
- Flandreau Santee Sioux Tribe of South Dakota
- Fond du Lac Band of the Minnesota Chippewa Tribe, Minnesota
- Grand Portage Band of the Minnesota Chippewa Tribe, Minnesota
- Keweenaw Bay Indian Community, Michigan
- Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wisconsin
- Santee Sioux Nation, Nebraska
- Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota
- Sokaogon Chippewa Community, Wisconsin
- Spirit Lake Tribe, North Dakota
- St. Croix Chippewa Indians of Wisconsin
- Upper Sioux Community, Minnesota
- White Earth Band of Minnesota Chippewa Tribe, Minnesota

Terracon originally sent letters requesting comments on March 26, 2009. The following tribes responded to Terracon's letter, stating the proposed project would not have effects on interested property, or that they were unaware of religious or cultural properties in the area: Bois Forte Band of Ojibwe, Grand Portage Band of the Minnesota Chippewa Tribe, Santee Sioux Nation, and White Earth Band of Minnesota Chippewa Tribe.

FEMA sent additional letters to the tribes stating that Terracon's original letter did not adequately state that the Proposed Action was a federally funded activity. The letter asked for a

second review and comments addressed to FEMA. Copies of the tribal correspondence are included in Appendix C.

FEMA requested a response from the tribes within 30 days of the issuance of the request letters (August 10, 2009); however, the 30 day response period has lapsed, and no responses from the tribes have been received at the issuance of this report.

Discussion of Alternatives

Proposed Action

During the Proposed Action, a portion of the site would be excavated for the removal of the existing UST and the installation of the new UST. Excavation activities could result in the discovery of artifacts or human remains.

No Action Alternative

Under the No Action Alternative, the existing UST system would remain and no excavation activities would be conducted.

3.6 Comparison of Alternatives

The following table summarizes and compares the potential impacts that could result from the Proposed Action and the No Action Alternative.

Potential Impacts Comparative Matrix

Affected Environment	Proposed Action	No Action Alternative	Best Management Practices / Mitigation Measures
Geology, Seismicity, and Soils	Short-term effects during construction phase for fugitive dust and soil erosion	No effects	Stockpile and cover the excavated soil on-site to reduce dust. If contaminated soil is discovered, soils would undergo waste characterization (sampled for laboratory analysis) before removal to an approved disposal site certified to accept petroleum contaminated soils.
Water Resources and Water Quality	Net benefit to the site watershed by upgrading UST and fuel system equipment on the site. Proposed Action would reduce the potential for hazardous contaminant release or spill to the environment.	Impacts to the site groundwater could occur from the leakage of the out of date and aging UST and fuel piping equipment. The current fuel piping system is single walled and does not have leak detection which increases the potential that impacts to the subsurface soils and groundwater at the site.	The Proposed Action would not require the use of groundwater to operate or complete.
Floodplain Management	Site is not located in a floodplain		

Affected Environment	Proposed Action	No Action Alternative	Best Management Practices / Mitigation Measures
Air Quality	Short-term effects during construction phase from construction equipment emissions; emissions from the operation of the emergency generators; short-term effect from construction activities particulate matter release to air by fugitive dust from excavated soil.	No effects	Excavated soils would be covered to reduce particulate matter release to air.
Terrestrial and Aquatic Environment	No effects		
Wetlands	Site is not located in a wetland		
Threatened and Endangered Species	No effects		
Hazardous Materials	Excavation activities could expose soils and groundwater that have been impacted by petroleum wastes or materials. After completion of proposed action, risk of petroleum releases would be lessened	Impacts to the site groundwater could occur from the leakage of the out of date and aging UST and fuel piping equipment. The current fuel piping system is single walled and does not have leak detection which increases the potential that impacts to the subsurface soils and groundwater at the site	Any hazardous materials discovered during construction would be assessed and remediated immediately according to local requirements. The minimum requirements for underground storage tank installation and removal, as identified by the MPCA, must be followed by the contractor overseeing the removal of the existing UST and the installation of the proposed action.

Affected Environment	Proposed Action	No Action Alternative	Best Management Practices / Mitigation Measures
Zoning and Land Use	No effects		
Visual Resources	No effects		
Noise	Short-term effects during construction phase from construction equipment	No effects	Construction noise would be limited to normal 8 AM to 5 PM work day
Public Services and Utilities	No effects		A representative of the Coon Rapids Fire Department is expected to be present during the removal of the existing UST as standard local protocol requires.
Traffic and Circulation	Traffic on Coon Rapids Boulevard would increase slightly during construction phase	No effects	Construction vehicles limited to normal 8 AM to 5 PM work day
Environmental Justice	No effects		
Safety and Security	Safety concerns associated with worker safety during construction phase. Positive effect to the site with new leak detection safeguards would reduce the potential for release and spills of dangerous substances to the human and natural environment.	Safety concerns associated with construction activities would be eliminated. The existing UST and piping system would remain in place, increasing the potential for releases and spills of hazardous materials to the human and natural environment.	Qualified personnel trained in the proper use of the appropriate equipment including appropriate safety precautions would be used; activities would be conducted in accordance with OSHA
Historic Structures	No effects		

Affected Environment	Proposed Action	No Action Alternative	Best Management Practices / Mitigation Measures
Archeological Resources	Excavation activities could result in the discovery of artifacts or human remains.	Area would remain undisturbed.	If artifacts or human remains are found during excavation process, work would cease and PEPAC will notify FEMA and the SHPO/THPO.
Tribal and Religious Sites	Excavation activities could result in the discovery of artifacts or human remains.	Area would remain undisturbed.	If artifacts or human remains are found during excavation process, work would cease and PEPAC will notify FEMA and the SHPO/THPO.

4.0 CUMULATIVE IMPACTS

The area surrounding the WCCO Transmitter Site is currently fully developed with residential, commercial, and educational properties. The Proposed Action entails the replacement and upgrade of existing fueling equipment; therefore, contributions of the Proposed Action to cumulative impacts in the area would be minimal.

5.0 PUBLIC PARTICIPATION

Pending review and approval of the Draft EA by FEMA, the Draft EA will be made available for public review at the local Crooked Lake Branch Library for a period of 30 days. Comments received from the public review period, if any, will be incorporated and addressed into the Final EA document. Responses to public comments, if any, and the final EA will be posted on the FEMA website.

6.0 MITIGATION MEASURES AND PERMITS

No mitigation measures or permits are anticipated associated with the Proposed Action. Mitigation measures for remediation could be required by state and federal regulatory agencies if contaminated groundwater or soil is discovered during the implementation of the Proposed Action.

7.0 CONSULTATIONS AND REFERENCES

Please see Appendix B for copies of all correspondence conducted to date for this Draft EA.

8.0 LIST OF PREPARERS

Please see Appendix C for resumes of preparers and reviewers of this Draft EA.

DRAFT